

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CC FORD GROUP WEST, LLC,

Plaintiff/Counter-Defendant,

v.

JENNIFER JOHNSON, CARRIE BICKING,
BETH WEILER, PROJECT VELOCITY,
INC., and JOHN DOES 1-10,

Defendants/Counterclaimants.

JENNIFER JOHNSON and PROJECT
VELOCITY, INC.,

Third-Party Plaintiffs,

v.

JOHN STUDDIFORD,

Third-Party Defendant.

Case No. 3:22-cv-04143

**NOTICE OF MOTION
FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

To: All counsel of record.

PLEASE TAKE NOTICE that Plaintiff/Counter-Defendant CC Ford Group West, LLC (“Plaintiff”), by and through its undersigned counsel, will move this Court on the 3rd day of September, 2024, at the United States District Court, District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, and upon the within notice of motion, the annexed certification of counsel and exhibits attached thereto, including the proposed Second Amended Complaint, the supporting memorandum of law, the form of order, and upon all other prior pleadings and proceedings had herein, for an Order pursuant to Rules 15(a) and 15(d) of the Federal Rules of Civil Procedure (“FRCP”) granting leave to file and

serve a Second Amended and Supplemental Complaint, and for such other and further relief as the Court deems just and proper; and

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests oral argument if opposed; and

PLEASE TAKE FURTHER NOTICE that no trial in matter is scheduled at present.

Date: July 26, 2024

MANDELBAUM BARRETT, P.C.
*Attorneys for Plaintiff/Counter-Defendant and
Third-Party Defendant*

s/Steven I. Adler
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